

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Luis Minchala Guaman,)
Petitioner,) Case No. 1:25-cv-11523
v.)
Patricia Hyde, Field Office Director,)
Michael Krol, HSI New England Special)
Agent in Charge, and Todd Lyons, Acting)
Director U.S. Immigrations and Customs)
Enforcement, and Kristi Noem, U.S. Secretary)
of Homeland Security,)
Respondents.)

)

**PETITION FOR WRIT OF
HABEAS CORPUS**

INTRODUCTION

1. Petitioner Luis Minchala Guaman is an Ecuadorian national who entered the United States without inspection and currently has a pending petition before the USCIS for Special immigrant Juvenile Status. On information and belief, he was unlawfully detained by federal immigration agents on May 23, 2025.
2. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner asks this Court to find that he was unlawfully detained and order his release.

JURISDICTION

4. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).
5. Venue is proper because Petitioner resides and was detained in Milford, MA, and on information and belief is detained in the District of Massachusetts.

PARTIES AND FACTS ALLEGED

6. Petitioner Luis Minchala Guaman is a 21-year-old young man who resides with his sister in Milford, Massachusetts. He was abused and neglected by his parents while living under their care in Ecuador.
7. Respondent Patricia Hyde is the New England Field Office Director for U.S. Immigration and Customs Enforcement.
8. Respondent Michael Krol is the New England Special Agent in Charge for Homeland Security Investigations for U.S. Immigration and Customs Enforcement.
9. Respondent Todd Lyons is the Acting Director for U.S. Immigration and Customs Enforcement.
10. Respondent Kristi Noem is the U.S. Secretary of Homeland Security.
11. All respondents are named in their official capacities.
12. Petitioner is an Ecuadorian national with a pending petition for Special Immigrant Juvenile Status as an abused and abandoned child that the United States has deemed it has an interest in protecting. On information and belief, he was detained without cause by U.S. Immigration and Customs Enforcement agents on May 23, 2025, while a passenger in a vehicle.
13. On information and belief, Petitioner is currently in custody in the District of Massachusetts, and one or more of the Respondents is his immediate custodian.

CLAIMS FOR RELIEF

COUNT ONE
Violation of Fifth Amendment Right to Due Process

1. On information and belief, Petitioner is currently being arrested and detained by federal agents without cause and in violation of his constitutional rights to due process of law.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Massachusetts;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.
- (4) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.

(6) Grant any further relief this Court deems just and proper.

Dated: May 28, 2025
Boston, Massachusetts

Respectfully submitted,

LUIS MINCHALA GUAMAN

By his attorney:



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